

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHEENA GRICE,)
Plaintiff,) Case No. 1:17-cv-10944-WGY
v.)
VIM HOLDINGS GROUP, LLC, MICHAEL)
D'AMBROSE, HIRSCH MOHINDRA, B)
FINANCIAL, LLC, JOHN BARTLETT, U)
SOLUTIONS GROUP, LLC, THERESA)
D'AMBROSE, GLOBAL SERVICE GROUP,)
LLC, RUTH POUTANEN, KRW ATTORNEYS)
& ASSOCIATES, LLC, and GEORGE WAHBEH,)
Defendants.)

)

NOTICE OF WITHDRAWAL OF DEFENDANTS' MOTIONS TO DISMISS

Defendants, VIM Holdings Group LLC, Michael D'Ambrose, B Financial LLC, John Bartlett, U Solutions Group LLC, Theresa D'Ambrose, Global Service Group LLC, Ruth Poutanen, KRW Attorneys and Associates, LLC, and George Wahbeh (collectively, "Defendants") by and through their attorneys, hereby withdraw the following motions without prejudice and subject to the Court's grant of leave to refile within thirty days of its grant of Locke Lord's motion to withdraw as counsel:

1. *Defendants' Motion to Dismiss for Lack of Personal Jurisdiction [Dkt. 21], Memorandum of Law in Support of Defendants' Motion to Dismiss for Lack of Personal Jurisdiction* with Exhibits 1 (Declaration of George Wahbeh) and 2 (Declaration of Michael D'Ambrose) [Dkt. 22] filed on July 14, 2017 on behalf of Defendants, VIM Holdings Group LLC, Michael D'Ambrose, John Bartlett, Theresa D'Ambrose, Global Service Group LLC, Ruth Poutanen, KRW Attorneys and Associates, LLC, and George Wahbeh; and
2. *Defendants' Motion to Dismiss for Failure to State a Claim, or in the Alternative, to Transfer Venue [Dkt. 23], Memorandum of Law in Support of Defendants' Motion to Dismiss for Failure to State a Claim, or in the Alternative, to Transfer Venue* with

Exhibit 1 (Declaration of Michael D'Ambrose) [**Dkt. 24**] filed on July 14, 2017 on behalf of Defendants, VIM Holdings Group LLC, Michael D'Ambrose, B Financial LLC, John Bartlett, U Solutions Group LLC, Theresa D'Ambrose, Global Service Group LLC, Ruth Poutanen, KRW Attorneys and Associates, LLC, and George Wahbeh.

Respectfully submitted,

/s/ Benjamin R. Davis

John A. Houlihan, BBO #542038
Benjamin R. Davis, BBO #673017
Locke Lord LLP
111 Huntington Avenue
Boston, MA 02199
617-239-0820
Benjamin.Davis@lockelord.com
John.Houlihan@lockelord.com

Attorney for Defendants

VIM Holdings Group LLC, Michael D'Ambrose, B Financial LLC, John Bartlett, U Solutions Group LLC, Theresa D'Ambrose, Global Service Group LLC, Ruth Poutanen, KRW Attorneys and Associates, LLC, and George Wahbeh

Dated: September 7, 2017

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 7th day of September, 2017, this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be mailed to those indicated as non-registered participants and defendants.

/s/ Benjamin R. Davis